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20SL-CC06023 - ANNA WILLIAMS V WAL-MART STORES EAST, LP (E-CASE)

Case Header	Parties & Attorneys	Docket Entries	Charges, Judgments & Sentences	Service Information	Filings Due	Scheduled Hearings & Trials	Civil Judgments	Garnishments/ Execution
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Sort Date Entries: Descending Ascending

Display Options: All Entries

- 06/07/2021 Notice**
 Loss of Consortium Notice; Electronic Filing Certificate of Service.
Filed By: EDWARD WILLIAM ZEIDLER II
On Behalf Of: WAL-MART STORES EAST, LP
- 06/03/2021 Cert Serv Answers Interrog Fil**
 COS - Answers to Deft Discovery; Electronic Filing Certificate of Service.
Filed By: ERIC ANTHONY RUTTENCUTTER
On Behalf Of: ANNA WILLIAMS
- 05/20/2021 Motion Hearing Scheduled**
Associated Entries: 05/18/2021 - Notice of Hearing Filed
Scheduled For: 06/24/2021; 1:00 PM ; ELLEN HANNIGAN RIBAUDO; St Louis County
- 05/18/2021 Note to Clerk eFiling**
Filed By: EDWARD WILLIAM ZEIDLER II
Memorandum Filed
 Defendants Memorandum to Court-Entry of Protective Order; Protective Order; Electronic Filing Certificate of Service.
Filed By: EDWARD WILLIAM ZEIDLER II
On Behalf Of: WAL-MART STORES EAST, LP
Notice of Hearing Filed
 Defendants Notice of Hearing-Motion for Entry of Protective Order; Electronic Filing Certificate of Service.
Filed By: EDWARD WILLIAM ZEIDLER II
On Behalf Of: WAL-MART STORES EAST, LP
Associated Entries: 05/20/2021 - Motion Hearing Scheduled
- 03/31/2021 Note to Clerk eFiling**
Filed By: JOHN PHILLIP RAHOY
Motion Filed
 Motion for Protective Order; Protective Order; Electronic Filing Certificate of Service.
Filed By: JOHN PHILLIP RAHOY
On Behalf Of: WAL-MART STORES EAST, LP
Cert Serv Answers Interrog Fil
 Defendants Certificate of Mailing-Answers to Plaintiffs First Interrogatories; Electronic Filing Certificate of Service.
Filed By: EDWARD WILLIAM ZEIDLER II
On Behalf Of: WAL-MART STORES EAST, LP

EXHIBIT

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- 03/19/2021 Certificate of Service**
Certificate of Service of Defendants Objections to Plaintiffs Interrogatories and Request for Production; Electronic Filing Certificate of Service.
Filed By: EDWARD WILLIAM ZEIDLER II
On Behalf Of: WAL-MART STORES EAST, LP
- 02/24/2021 Cert Serv Req Prod Docs Things**
COS - Discovery to Deft; Electronic Filing Certificate of Service.
Filed By: ERIC ANTHONY RUTTENCUTTER
On Behalf Of: ANNA WILLIAMS
- 02/23/2021 Cert Serv Resp Req Prod Doc Th**
COS - Objections to Deft Discovery; Electronic Filing Certificate of Service.
Filed By: ERIC ANTHONY RUTTENCUTTER
On Behalf Of: ANNA WILLIAMS
- 02/01/2021 Entry of Appearance Filed**
Entry of Appearance of Edward W Zeidler II; Electronic Filing Certificate of Service.
Filed By: EDWARD WILLIAM ZEIDLER II
On Behalf Of: WAL-MART STORES EAST, LP
- 01/15/2021 Cert Serv of Interrog Filed**
Defendants Certificate of Service of Interrogatories and Request for Production to Plaintiff; Electronic Filing Certificate of Service.
Filed By: JOHN PHILLIP RAHOY
On Behalf Of: WAL-MART STORES EAST, LP
- Answer Filed**
Filed By: JOHN PHILLIP RAHOY
On Behalf Of: WAL-MART STORES EAST, LP
- Entry of Appearance Filed**
Entry of Appearance of John Rahoy for Defendant; Electronic Filing Certificate of Service.
Filed By: JOHN PHILLIP RAHOY
- 12/28/2020 Corporation Served**
Document ID - 20-SMCC-11095; Served To - WAL-MART STORES EAST, LP; Server - ; Served Date - 16-DEC-20; Served Time - 00:00:00; Service Type - Special Process Server; Reason Description - Served
- 12/23/2020 Notice of Service**
Memo Filing Return of Service; Electronic Filing Certificate of Service.
Filed By: ERIC ANTHONY RUTTENCUTTER
On Behalf Of: ANNA WILLIAMS
- 12/14/2020 Summons Issued-Circuit**
Document ID: 20-SMCC-11095, for WAL-MART STORES EAST, LP.
- Filing Info Sheet eFiling**
Filed By: ROBERT H. PEDROLI JR.
- Motion Special Process Server**
Request for Special Process Server.Summons Attached in PDF Form for Attorney to Retrieve from Secure Case.Net and Process for Service.

Filed By: ROBERT H. PEDROLI JR.

On Behalf Of: ANNA WILLIAMS

Pet Filed in Circuit Ct

Petition for Damages.

Judge Assigned



IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: ELLEN HANNIGAN RIBAUDO	Case Number: 20SL-CC06023
Plaintiff/Petitioner: ANNA WILLIAMS vs.	Plaintiff's/Petitioner's Attorney/Address ROBERT H. PEDROLI JR. 7777 BONHOMME SUITE 2250 CLAYTON, MO 63105
Defendant/Respondent: WAL-MART STORES EAST, LP	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Pers Injury-Other	

(Date File Stamp)

Summons in Civil Case

<p>The State of Missouri to: WAL-MART STORES EAST, LP Alias: CT CORP SERVICES 120 S. CENTRAL CLAYTON, MO 63105</p> <p>COURT SEAL OF  ST. LOUIS COUNTY</p>	
<p>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p> <p>SPECIAL NEEDS: If you have special needs addressed by the Americans With Disabilities Act, please notify the Office of the Circuit Clerk at 314-615-8029, FAX 314-615-8739, email at SLCADA@courts.mo.gov, or through Relay Missouri by dialing 711 or 800-735-2966, at least three business days in advance of the court proceeding.</p> <p><u>14-DEC-2020</u> Date</p> <p>Further Information: AW</p> <p>Sheriff's or Server's Return</p>	

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
 leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.
 (for service on a corporation) delivering a copy of the summons and a copy of the petition to

_____ (name) _____ (title).

other _____.

Served at _____ (address)
in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on _____ (date).

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary

Supplemental Surcharge \$ _____ 10.00

Mileage \$ _____ (_____ miles @ \$. _____ per mile)

Total

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

THE CIRCUIT COURT OF ST. LOUIS COUNTY, MISSOURI

Twenty First Judicial Circuit

NOTICE OF ALTERNATIVE DISPUTE RESOLUTION SERVICES

Purpose of Notice

As a party to a lawsuit in this court, you have the right to have a judge or jury decide your case. However, most lawsuits are settled by the parties before a trial takes place. This is often true even when the parties initially believe that settlement is not possible. A settlement reduces the expense and inconvenience of litigation. It also eliminates any uncertainty about the results of a trial.

Alternative dispute resolution services and procedures are available that may help the parties settle their lawsuit faster and at less cost. Often such services are most effective in reducing costs if used early in the course of a lawsuit. Your attorney can aid you in deciding whether and when such services would be helpful in your case.

Your Rights and Obligations in Court Are Not Affected By This Notice

You may decide to use an alternative dispute resolution procedure if the other parties to your case agree to do so. In some circumstances, a judge of this court may refer your case to an alternative dispute resolution procedure described below. These procedures are not a substitute for the services of a lawyer and consultation with a lawyer is recommended. Because you are a party to a lawsuit, you have obligations and deadlines which must be followed whether you use an alternative dispute resolution procedure or not. **IF YOU HAVE BEEN SERVED WITH A PETITION, YOU MUST FILE A RESPONSE ON TIME TO AVOID THE RISK OF DEFAULT JUDGMENT, WHETHER OR NOT YOU CHOOSE TO PURSUE AN ALTERNATIVE DISPUTE RESOLUTION PROCEDURE.**

Alternative Dispute Resolution Procedures

There are several procedures designed to help parties settle lawsuits. Most of these procedures involve the services of a neutral third party, often referred to as the "neutral," who is trained in dispute resolution and is not partial to any party. The services are provided by individuals and organizations who may charge a fee for this help. Some of the recognized alternative dispute resolutions procedures are:

(1) Advisory Arbitration: A procedure in which a neutral person or persons (typically one person or a panel of three persons) hears both sides and decides the case. The arbitrator's decision is not binding and simply serves to guide the parties in trying to settle their lawsuit. An arbitration is typically less formal than a trial, is usually shorter, and may be conducted in a private setting at a time mutually agreeable to the parties. The parties, by agreement, may select the arbitrator(s) and determine the rules under which the arbitration will be conducted.

(2) Mediation: A process in which a neutral third party facilitates communication between the parties to promote settlement. An effective mediator may offer solutions that have not been considered by the parties or their lawyers. A mediator may not impose his or her own judgment on the issues for that of the parties.

CCADM73

(3) Early Neutral Evaluation (“ENE”): A process designed to bring the parties to the litigation and their counsel together in the early pretrial period to present case summaries before and receive a non-binding assessment from an experienced neutral evaluator. The objective is to promote early and meaningful communication concerning disputes, enabling parties to plan their cases effectively and assess realistically the relative strengths and weaknesses of their positions. While this confidential environment provides an opportunity to negotiate a resolution, immediate settlement is not the primary purpose of this process.

(4) Mini-Trial: A process in which each party and their counsel present their case before a selected representative for each party and a neutral third party, to define the issues and develop a basis for realistic settlement negotiations. The neutral third party may issue an advisory opinion regarding the merits of the case. The advisory opinion is not binding.

(5) Summary Jury Trial: A summary jury trial is a non binding, informal settlement process in which jurors hear abbreviated case presentations. A judge or neutral presides over the hearing, but there are no witnesses and the rules of evidence are relaxed. After the “trial”, the jurors retire to deliberate and then deliver an advisory verdict. The verdict then becomes the starting point for settlement negotiations among the parties.

Selecting an Alternative Dispute Resolution Procedure and a Neutral

If the parties agree to use an alternative dispute resolution procedure, they must decide what type of procedure to use and the identity of the neutral. As a public service, the St. Louis County Circuit Clerk maintains a list of persons who are available to serve as neutrals. The list contains the names of individuals who have met qualifications established by the Missouri Supreme Court and have asked to be on the list. The Circuit Clerk also has Neutral Qualifications Forms on file. These forms have been submitted by the neutrals on the list and provide information on their background and expertise. They also indicate the types of alternative dispute resolution services each neutral provides.

A copy of the list may be obtained by request in person and in writing to: Circuit Clerk, Office of Dispute Resolution Services, 105 South Central Ave., 5th Floor, Clayton, Missouri 63105. The Neutral Qualifications Forms will also be made available for inspection upon request to the Circuit Clerk.

The List and Neutral Qualification Forms are provided only as a convenience to the parties in selecting a neutral. The court cannot advise you on legal matters and can only provide you with the List and Forms. You should ask your lawyer for further information.

CCADM73

STATE OF MISSOURI)
) SS
COUNTY OF ST. LOUIS)

IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI

ANNA WILLIAMS,)
)
Plaintiff,) Cause No.
)
vs.) Division No.
)
WAL-MART STORES, EAST, L.P.) **JURY TRIAL DEMANDED**
Serve:)
Registered Agent)
CT Corporation)
120 S. Central Avenue)
St. Louis, MO 63105)
)
Defendant.)

PETITION FOR DAMAGES
COUNT I NEGLIGENCE

Comes now Plaintiff, Anna Williams, by and through her attorneys, and for her cause of action for negligence against Defendant, Wal-Mart Stores, East, L.P., states to the Court as follows:

1. That at all times herein mentioned Plaintiff, Anna Williams, was a resident of the State of Missouri.
2. That at all times relevant to this action, Defendant, Wal-Mart Stores, East, L.P., is a corporation in good standing with offices and agents for the transaction of its usual and customary business in the State of Missouri, and at all times mentioned herein, was acting by and through its agents, servants, and employees.
3. That on or about March 14, 2018, Plaintiff, Anna Williams, was lawfully and rightfully at the invitation of Defendant, Wal-Mart Stores, East, L.P., at the Wal-Mart

retail self service store number 805 located in Fenton, MO, when Plaintiff, Anna Williams was injured by a bicycle that fell off an elevated bicycle display while one of Defendant's employees was removing it from the display.

4. That Defendant's employee was negligent and failed to use ordinary care in moving the bicycle from its display rack, in that the bicycle fell and landed on Plaintiff, directly causing and contributing to cause Plaintiff to sustain serious, permanent and progressive injuries as herein more fully described, including negligence in the following respects:

a. Employee failed to warn Plaintiff to move away when she attempted to remove the bicycle from the elevated display rack;

b. Employee failed to securely grasp the bicycle prior to attempting to remove it from the elevated display rack;

c. While removing the bicycle, employee dropped the bicycle so that it fell onto Plaintiff;

d. Employee had sole control of the bicycle and while removing the bicycle, it fell on Plaintiff and employee is deemed negligent under the theory of res ipsa loquitur.

5. As a direct and proximate result of the negligence of Defendant, Wal-Mart Stores, East, L.P., Plaintiff Anna Williams, sustained serious and permanent and painful injuries to her head, neck, back, left shoulder, right shoulder, left elbow and left wrist, resulting in permanent disability to her person, and all of Plaintiff's injuries are permanent and progressive.

6. As a direct and proximate result of the negligence, carelessness, failures and omissions of Defendant, Wal-Mart Stores, East, L.P., as stated aforesaid, Plaintiff,

Anna Williams, has been caused to expend sums of money for reasonable medical, surgical, physician and hospital care, and Plaintiff will be caused to undergo further reasonable and necessary medical care, in the future for which she will become indebted and Plaintiff lost wages.

WHEREFORE, Plaintiff, Anna Williams, prays judgment against Defendant, Wal-Mart Stores, East, L.P., in an amount that is fair and reasonable in excess of Twenty-Five Thousand Dollars (\$25,000.00), and for her costs expended herein and for such other and further relief as the Court deems just and proper under the circumstances.

COUNT II, PREMISE LIABILITY

Comes now Plaintiff, Anna Williams, by and through her attorneys, and for her cause of action for premise liability against Defendant, Wal-Mart Stores, East, L.P., states to the Court as follows:

1. That Plaintiff hereby incorporates all of Count I of this Petition, as if fully set forth herein.
2. That Defendant owns, controls and maintains or has the duty to maintain the bicycle rack in issue, and it did not maintain said rack in a reasonably safe condition.
3. That Defendant knew or by using ordinary care should and could have known of this condition to have corrected or removed it, barricaded the area or warned of the area, but Defendant failed to do so.
4. That the bicycle rack is defective in design and dangerous in use so that it is not apparent that the bicycles are not securely on the rack and therefore unstable when on the rack or being removed.

WHEREFORE, Plaintiff, Anna Williams, prays judgment against Defendant, Wal-Mart Stores, East, L.P., in an amount that is fair and reasonable in excess of Twenty-Five Thousand Dollars (\$25,000.00), and for her costs expended herein and for such other and further relief as the Court deems just and proper under the circumstances.



Robert H. Pedroli, Jr. – MO #34257
Eric A. Ruttencutter – MO #38883
PEDROLI & GAUTHIER, LLC
Attorneys for Plaintiff
130 S. Bemiston, Suite 300
Clayton, MO 63105-1911
314/726-1817
314/726-6087 (Fax)

9/15/20
jrg

STATE OF MISSOURI)
) SS
COUNTY OF ST. LOUIS)

IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI

ANNA WILLIAMS,)
)
Plaintiff,) Cause No. 20SL-CC06023
)
vs.)
)
WAL-MART STORES EAST, LP,)
)
)
Defendant.)

MEMORANDUM TO CLERK

Comes now Plaintiff, Anna Williams, by and through her attorneys of record, and hereby files Return of Service on Defendant, Wal-Mart Stores East, LP.



Robert H. Pedroli, Jr. – MO #34257
Eric A. Ruttencutter- 38883
PEDROLI & GAUTHIER, LLC
Attorneys for Plaintiff
130 S. Bemiston, Suite 300
Clayton, MO 63105-1911
314/726-1817
314/726-6087 (Fax)

12/22/20
lcl



IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: ELLEN HANNIGAN RIBAUDO	Case Number: 20SL-CC06023
Plaintiff/Petitioner: ANNA WILLIAMS	Plaintiff's/Petitioner's Attorney/Address ROBERT H. PEDROLI JR. 7777 BONHOMME SUITE 2250 CLAYTON, MO 63105
vs.	
Defendant/Respondent: WAL-MART STORES EAST, LP	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: **WAL-MART STORES EAST, LP**

Alias:

CT CORP SERVICES
120 S. CENTRAL
CLAYTON, MO 63105

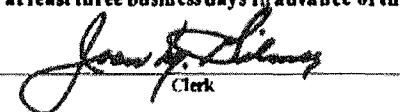
COURT SEAL OF**ST. LOUIS COUNTY**

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

SPECIAL NEEDS: If you have special needs addressed by the Americans With Disabilities Act, please notify the Office of the Circuit Clerk at 314-615-8029, FAX 314-615-8739, email at SLCADA@courts.mo.gov, or through Relay Missouri by dialing 711 or 800-735-2966, at least three business days in advance of the court proceeding.

14-DEC-2020

Date



Clerk
Further Information:
AW

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
 leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.
 (for service on a corporation) delivering a copy of the summons and a copy of the petition to

BONNIE LOVE(name) **INTAKE SPECIALIST** (title) otherServed at **120 S CENTRAL AVE CLAYTON MO 63105**

(address)

in **ST. LOUIS**

(County/City of St. Louis), MO, on

DEC. 16 2020 (date) at **2:00 PM** (time).**KATHLEEN LANGDON**

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on

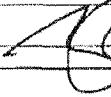
12-14-20

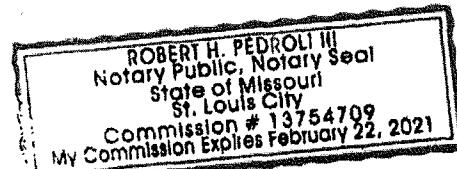
(date).

(Seal)

My commission expires: **2-02-21**

Date



Notary Public


IN THE CIRCUIT COURT OF ST LOUIS COUNTY
STATE OF MISSOURI

ANNA WILLIAMS,)
Plaintiff,)
vs.) Cause No: 20SL-CC06023
WAL-MART STORES EAST, L.P.) Division No: 18
Defendant.) **Defendant Demands Trial By Jury**

CERTIFICATE OF SERVICE

Defendant's First Interrogatories and Request for Production of Documents Directed to Plaintiff were emailed this 15th day of January, 2021 in Microsoft Word Format to mylegalworld@sbcglobal.net, Robert H. Pedroli, Jr. Eric Ruttencutter, Pedroli & Gauthier, LLC, Attorneys for Plaintiff, 130 S. Bemiston, Suite 300, Clayton, MO 63105-1911.

/s/ John P. Rahoy

John P. Rahoy #41896
BROWN & JAMES, P.C.
Attorney for Defendant Wal-Mart Stores East, LP
800 Market Street, Suite 1100
St. Louis, Missouri 63101
(314) 421-3400
(314) 421-3128 (Fax)
jrahoy@bjpc.com

The undersigned hereby certifies that the above and foregoing pleading was filed electronically with the above-captioned Court, with notice of case activity to be generated and sent electronically by the Clerk of said Court to: mylegalworld@sbcglobal.net, Robert H. Pedroli, Jr. Eric Ruttencutter, Pedroli & Gauthier, LLC, Attorneys for Plaintiff, 130 S. Bemiston, Suite 300, Clayton, MO 63105-1911, this 15th day of January 2021. Pursuant to Rule 55.03(a), the undersigned further certifies that he signed an original of this pleading and that an original of this pleading shall be maintained for a period not less than the maximum allowable time to complete the appellate process.

/s/ John P Rahov

IN THE CIRCUIT COURT OF ST LOUIS COUNTY
STATE OF MISSOURI

ANNA WILLIAMS,)
vs.)
Plaintiff,)
WAL-MART STORES EAST, L.P.)
Defendant.)
Cause No: 20SL-CC06023
Division No: 18
Defendant Demands Trial By Jury

ANSWER OF DEFENDANT WAL-MART STORES EAST, L.P.

COMES NOW defendant Wal-Mart Stores East, L.P. and for its Answer to Plaintiff's
Petition states as follows:

COUNT I

1. Defendant is without sufficient information to admit or deny the allegations of paragraph 1 of plaintiff's Petition and, therefore, denies the same.
 2. Defendant denies the allegations contained in paragraph 2 of Plaintiff's Petition.
 3. Defendant denies the allegations contained in paragraph 3 of Plaintiff's Petition.
 4. Defendant denies the allegations contained in paragraph 4 of Plaintiff's Petition.
 5. Defendant denies the allegations contained in paragraph 5 of Plaintiff's Petition.
 6. Defendant denies the allegations contained in paragraph 6 of Plaintiff's Petition.

COUNT II

1. Defendant incorporates by reference its Answer to Count I as if set forth fully herein in response to paragraph 1 of Count II of plaintiff's Petition.
 2. Defendant denies the allegations contained in paragraph 2 of Plaintiff's Petition.
 3. Defendant denies the allegations contained in paragraph 3 of Plaintiff's Petition.
 4. Defendant denies the allegations contained in paragraph 4 of Plaintiff's Petition.

AFFIRMATIVE DEFENSES

1. For further Answer and affirmative defense, Defendant states that Plaintiff has failed to state a cause of action upon which relief can be granted against this Defendant.
2. For further Answer and affirmative defense, Defendant states that whatever injuries and damages were sustained by Plaintiff, if any, were the direct and proximate result of her own carelessness, negligence and/or comparative fault.
3. Defendant states the sole and proximate cause of plaintiffs' injuries and damages, if any, were the direct and proximate result of the carelessness, negligence and/or comparative fault of another individual not under control of this defendant.
4. For further Answer and defense, Defendant states that, in the event of an adjudication of the issues in this cause whereby this Defendant is held liable to respond in damages to Plaintiff, Defendant provides notice to the Court and all parties that he intends to invoke the provisions of R.S.Mo. § 490.715 which provides that parties may introduce evidence of the actual cost of the medical care or treatment rendered to a Plaintiff or patient whose care is at issue, and actual cost is defined as a sum of money not to exceed the dollar amounts paid by or on behalf of a Plaintiff or a patient whose care is at issue plus any remaining dollar amount necessary to satisfy the financial obligation for medical care or treatment by a health care provider after adjustment for any contractual discounts, price reduction, or write-off by any person or entity.

WHEREFORE, having fully answered plaintiff's Petition, defendant Wal-Mart Stores East, L.P. prays to be dismissed with its costs.

/s/ John P. Rahoy

John P. Rahoy #41896
BROWN & JAMES, P.C.
Attorney for Defendant Wal-Mart Stores East, LP
800 Market Street, Suite 1100
St. Louis, Missouri 63101
(314) 421-3400
(314) 421-3128 (Fax)
jrahoy@bjpc.com

The undersigned hereby certifies that the above and foregoing pleading was filed electronically with the above-captioned Court, with notice of case activity to be generated and sent electronically by the Clerk of said Court to: mylegalworld@sbcglobal.net, Robert H. Pedroli, Jr. Eric Ruttencutter, Pedroli & Gauthier, LLC, Attorneys for Plaintiff, 130 S. Bemiston, Suite 300, Clayton, MO 63105-1911, this 15th day of January 2021. Pursuant to Rule 55.03(a), the undersigned further certifies that he signed an original of this pleading and that an original of this pleading shall be maintained for a period not less than the maximum allowable time to complete the appellate process.

/s/ John P. Rahoy

IN THE CIRCUIT COURT OF ST LOUIS COUNTY
STATE OF MISSOURI

ANNA WILLIAMS,)
vs.)
Plaintiff,) Cause No: 20SL-CC06023
WAL-MART STORES EAST, L.P.) Division No: 18
Defendant.) **Defendant Demands Trial By Jury**

ENTRY OF APPEARANCE

COME NOW John P. Rahoy and Brown & James, P.C. and enter their appearance for
Defendant Wal-Mart Stores East, L.P.

/s/ John P. Rahoy

John P. Rahoy #41896
BROWN & JAMES, P.C.
Attorney for Defendant Wal-Mart Stores East, LP
800 Market Street, Suite 1100
St. Louis, Missouri 63101
(314) 421-3400
(314) 421-3128 (Fax)
irahoy@bjpc.com

The undersigned hereby certifies that the above and foregoing pleading was filed electronically with the above-captioned Court, with notice of case activity to be generated and sent electronically by the Clerk of said Court to: mylegalworld@sbcglobal.net, Robert H. Pedroli, Jr. Eric Ruttencutter, Pedroli & Gauthier, LLC, Attorneys for Plaintiff, 130 S. Bemiston, Suite 300, Clayton, MO 63105-1911, this 15th day of January, 2021. Pursuant to Rule 55.03(a), the undersigned further certifies that he signed an original of this pleading and that an original of this pleading shall be maintained for a period not less than the maximum allowable time to complete the appellate process.

IN THE CIRCUIT COURT OF ST LOUIS COUNTY
STATE OF MISSOURI

ANNA WILLIAMS,)
vs.)
Plaintiff,) Cause No: 20SL-CC06023
WAL-MART STORES EAST, L.P.) Division No: 18
Defendant.) **Defendant Demands Trial By Jury**

ENTRY OF APPEARANCE

COMES NOW Edward W. Zeidler, Brown & James, P.C., and hereby enters his appearance on behalf of Defendant Wal-Mart Stores East, L.P.

/s/ Edward W. Zeidler II

John P. Rahoy #41896
Edward W. Zeidler II #56638
BROWN & JAMES, P.C.
Attorney for Defendant Wal-Mart Stores East, LP
800 Market Street, Suite 1100
St. Louis, Missouri 63101
(314) 421-3400
(314) 421-3128 (Fax)
jrahoy@bjpc.com
ezeidler@bjpc.com

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/s/ Edward W. Zeidler II

25453847.1/jbk
2/1/2021

STATE OF MISSOURI)
)
) SS
COUNTY OF ST. LOUIS)

IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI

ANNA WILLIAMS,)
)
Plaintiff,) Cause No. 20SL-CC06023
)
vs.)
)
WAL-MART STORES EAST, LP,)
)
)
Defendant.)

CERTIFICATE OF SERVICE

The undersigned hereby states that Plaintiff's Objections to Defendant's Request for Production of Documents Directed to Plaintiff and Plaintiff's Objection to Defendant's Interrogatory No. 6 Directed to Plaintiff, were emailed, this 23 day of February, 2021, to Mr. John Rahoy – jrahoy@bjpc.com.



Robert H. Pedroli, Jr. – MO #34257
Eric A. Ruttencutter- 38883
PEDROLI & GAUTHIER, LLC
Attorneys for Plaintiff
130 S. Bemiston, Suite 300
Clayton, MO 63105-1911
314/726-1817
314/726-6087 (Fax)

2/22/21
lcl

STATE OF MISSOURI)
)
) SS
COUNTY OF ST. LOUIS)

IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI

ANNA WILLIAMS,)
)
Plaintiff,) Cause No. 20SL-CC06023
)
vs.)
)
WAL-MART STORES EAST, LP,)
)
)
Defendant.)

CERTIFICATE OF SERVICE

The undersigned hereby states that Plaintiff's Request for Production of Documents Directed to Defendant and Plaintiff's Interrogatories Directed to Defendant, were emailed, this 24 day of February, 2021, to Mr. John Rahoy – jrahoy@bjpc.com.



Robert H. Pedroli, Jr. – MO #34257
Eric A. Ruttencutter- 38883
PEDROLI & GAUTHIER, LLC
Attorneys for Plaintiff
130 S. Bemiston, Suite 300
Clayton, MO 63105-1911
314/726-1817
314/726-6087 (Fax)

2/22/21
lcl

IN THE CIRCUIT COURT OF ST LOUIS COUNTY
STATE OF MISSOURI

ANNA WILLIAMS,)
vs.)
Plaintiff,)
vs.)
WAL-MART STORES EAST, L.P.)
Defendant.)
) Cause No: 20SL-CC06023
) Division No: 18
) **Defendant Demands Trial By Jury**

CERTIFICATE OF SERVICE

Defendant's Objections to Plaintiff's First Interrogatories and Request for Production of
Documents were emailed this 19th day of March 2021 to mylegalworld@sbcglobal.net, Robert
H. Pedroli, Jr. Eric Ruttencutter, Pedroli & Gauthier, LLC, Attorneys for Plaintiff, 130 S.
Bemiston, Suite 300, Clayton, MO 63105-1911.

/s/ John P. Rahoy

John P. Rahoy #41896
BROWN & JAMES, P.C.
Attorney for Defendant Wal-Mart Stores East, LP
800 Market Street, Suite 1100
St. Louis, Missouri 63101
(314) 421-3400
(314) 421-3128 (Fax)
jrahoy@bjpc.com

The undersigned hereby certifies that the above and foregoing pleading was filed electronically with the above-captioned Court, with notice of case activity to be generated and sent electronically by the Clerk of said Court to: mylegalworld@sbcglobal.net, Robert H. Pedroli, Jr. Eric Ruttencutter, Pedroli & Gauthier, LLC, Attorneys for Plaintiff, 130 S. Bemiston, Suite 300, Clayton, MO 63105-1911, this 19th day of March 2021. Pursuant to Rule 55.03(a), the undersigned further certifies that he signed an original of this pleading and that an original of this pleading shall be maintained for a period not less than the maximum allowable time to complete the appellate process.

/s/ John P Rahoy

IN THE CIRCUIT COURT OF ST LOUIS COUNTY
STATE OF MISSOURI

ANNA WILLIAMS,)
)
 Plaintiff,) Cause No: 20SL-CC06023
)
 vs.) Division No: 18
)
 WAL-MART STORES EAST, L.P.) Defendant Demands Trial By Jury
)
 Defendant.)

DEFENDANT WAL-MART STORES EAST, L.P.'S
MOTION FOR ENTRY OF PROTECTIVE ORDER

COMES NOW Defendant Wal-Mart Stores East, LP, and for its Motion for Entry of Protective Order, pursuant to Rule 56.01(c) of the Missouri Rules of Civil Procedure, states as follows:

1. This matter arises from an alleged incident in which Plaintiff claims that a bicycle fell from a rack inside Defendant's store and contacted Plaintiff. Plaintiff claims that she sustained bodily injury as a result of this incident.
2. Plaintiff has propounded First Interrogatories and a First Request for Production of Documents to Defendant.
3. Certain of Plaintiff's First Interrogatories and First Request for Production of Documents seek confidential, trade secret and/or proprietary information and/or documents of Defendant.
4. Defendant has a legitimate business interest in protecting this information and these documents, and in safeguarding against the disclosure of such information and documents to Defendant's commercial competitors.
5. Entry of a Protective Order governing the disclosure and subsequent handling of this information and these documents is necessary for the protection of Defendant's proprietary, trade secret and other confidential, commercial and/or personal information.
6. Defendant has attached a proposed Protective Order hereto as Exhibit A.

7. Plaintiff's counsel has reviewed the Protective Order attached hereto as Exhibit A and consents to entry of same.

WHEREFORE, Defendant Wal-Mart Stores East, LP prays this Court for its Order sustaining Defendant's Motion for Entry of Protective Order and entering the Protective Order attached hereto as Exhibit A and for such other further relief as this court deems fair and just.

/s/ Edward W. Zeidler

John P. Rahoy #41896
Edward W. Zeidler II #56638
BROWN & JAMES, P.C.
Attorney for Defendant Wal-Mart Stores East, LP
800 Market Street, Suite 1100
St. Louis, Missouri 63101
(314) 421-3400
(314) 421-3128 (Fax)
jrahoy@bjpc.com
ezeidler@bjpc.com

The undersigned hereby certifies that the above and foregoing pleading was filed electronically with the above-captioned Court, with notice of case activity to be generated and sent electronically by the Clerk of said Court to: mylegalworld@sbcglobal.net, Robert H. Pedroli, Jr. Eric Ruttencutter, Pedroli & Gauthier, LLC, Attorneys for Plaintiff, 130 S. Bemiston, Suite 300, Clayton, MO 63105-1911, this 31st day of March 2021. Pursuant to Rule 55.03(a), the undersigned further certifies that he signed an original of this pleading and that an original of this pleading shall be maintained for a period not less than the maximum allowable time to complete the appellate process.

/s/ Edward W. Zeidler

IN THE CIRCUIT COURT OF ST LOUIS COUNTY
STATE OF MISSOURI

ANNA WILLIAMS,)
vs.)
Plaintiff,) Cause No: 20SL-CC06023
WAL-MART STORES EAST, L.P.) Division No: 18
Defendant.) Defendant Demands Trial By Jury

PROTECTIVE ORDER

After consideration of the Motion for Protective Order filed by Defendant Wal-Mart Stores East, L.P. ("Defendant"), and for good cause shown, the Court hereby enters this Protective Order governing the disclosure during pretrial discovery and the subsequent handling of trade secret information, proprietary information, other confidential commercial, financial, or personal information, and documents containing any such information (hereinafter collectively referred to as "CONFIDENTIAL INFORMATION") as follows:

1. Initial Designation.

1.1 Produced Documents. A party producing documents that it believes constitute or contains CONFIDENTIAL INFORMATION shall produce copies bearing a label that contains (or includes) language substantially identical to the following:

"CONFIDENTIAL"

This label shall be affixed in a manner that does not obliterate or obscure the contents of the copies. As used herein, the term "documents" includes all writings, other media on which information is recorded, and other tangible things subject to production under Missouri Rule of Civil Procedure 58. Claims of confidentiality will be made only with respect to documents to which the asserting party has a good faith belief and are legally entitled to protection from discovery and disclosure under Missouri Rule of Civil Procedure 56.01(c) and applicable case law.

1.2 Interrogatory Answers. If a party answering an Interrogatory believes that its Answer contains CONFIDENTIAL INFORMATION, it shall set forth its Answer in a separate document that is produced and designated as CONFIDENTIAL INFORMATION in the same manner as a produced document under subparagraph 1.1. The Answers to Interrogatories should make reference to the separately produced document containing the Answer, but such document should not be attached to the Interrogatories.

1.3 Inspection of Documents. In the event a party elects to produce files and records for inspection and the requesting party elects to inspect them, no designation of CONFIDENTIAL INFORMATION need be made in advance of the inspection. For purposes of such inspection, all material produced shall be considered as CONFIDENTIAL INFORMATION. If the inspecting party selects specified documents to be copied, the producing party shall designate CONFIDENTIAL INFORMATION in accordance with subparagraph 1.1 at the time the copies are produced.

1.4 Deposition Transcripts. After the receipt of a deposition transcript, a party may inform the other parties to the action of the portions of the transcript that it wishes to designate as CONFIDENTIAL INFORMATION. A deposition transcript in its entirety is to be considered as CONFIDENTIAL INFORMATION for twenty-one (21) days after receipt. If no designation is made within twenty-one (21) days of receipt, the deposition transcript shall not be considered as CONFIDENTIAL INFORMATION. All parties in possession of a copy of a designated deposition transcript shall appropriately mark it as containing CONFIDENTIAL INFORMATION. If portions of the transcript are designated confidential within 21 days, only those portions shall remain confidential, and the remaining portion of the transcript shall NOT be considered confidential.

1.5 Multipage Documents. A party may designate all pages of an integrated multipage document, including a deposition transcript and Interrogatory Answers, as CONFIDENTIAL INFORMATION by placing the label specified in subparagraph 1.1 on the first page of the document. If a

party wishes to designate only certain portions of an integrated, multipage document as CONFIDENTIAL INFORMATION, it should designate such portions immediately below the label on the first page of the document and place the label specified in subparagraph 1.1 on each page of the document containing CONFIDENTIAL INFORMATION. If portions of the integrated, multipage document are designated confidential, only those portions shall remain confidential, and the remaining portion of the document shall NOT be considered confidential.

1.6 Objections to Designations. Any party objecting to an initial designation of CONFIDENTIAL INFORMATION, including objections to portions of multipage documents, shall notify the designating party. Any objection shall be made in good faith. A party shall not be obligated to challenge the propriety of the designation at the time such designation is made, and failure to do so shall not preclude a subsequent challenge during the pendency of this litigation, provided that any such challenge may be made by motion, and taken up for hearing with the Court within sixty (60) days from the filing of the challenge, subject to the applicable provisions of this Order, the Missouri Rules of Civil Procedure and/or rules of this Court, including the obligation to confer in good faith prior to the filing of any such motion. The objecting and the designating party shall promptly confer in an attempt to resolve their differences. If the designating and objecting parties are unable to resolve their differences, the designating party shall have fourteen (14) days from the receipt of the objection to file with the Court a Motion for Protective Order. All documents initially designated as CONFIDENTIAL INFORMATION shall continue to be subject to this Order unless and until the Court rules otherwise. If a designating party elects not to make a Motion for Protective Order with respect to documents to which an objection has been made, it shall be deemed to have withdrawn its designation, and it shall produce copies of such documents without the CONFIDENTIAL INFORMATION designation if so requested. If a party contests the designation of confidentiality, then the party asserting confidentiality has the burden of proving confidentiality so long as the challenging party has a good faith basis to the challenge. Statements of

Plaintiff are discoverable and shall be produced to Plaintiff. However, a report containing statements of Plaintiff do not become discoverable by virtue of the inclusion of Plaintiff's statements contained in the report. If a report contains statements of Plaintiff, the content of the statements may be produced in lieu of producing the report.

2. Custody. During the pendency of this litigation and for ninety (90) days after the conclusion of this litigation, all CONFIDENTIAL INFORMATION and any and all copies, extracts and summaries thereof, including memoranda relating thereto, shall be retained by the receiving party in the custody of counsel of record, or by persons to whom disclosure is authorized under subparagraph 4.1, or by the Judge and Jury. Paragraph 6 addresses in more detail handling of CONFIDENTIAL INFORMATION after the conclusion of this litigation.

3. Handling Prior to Trial.

3.1 Authorized Disclosures. CONFIDENTIAL INFORMATION shall be disclosed by the receiving party only to the following persons, either after having obtained a written acknowledgment from such person that he or she has been advised of the existence and terms of this Protective Order and agrees to be bound by it, or after having provided to such person written notice and instructions regarding the existence and terms of this Protective Order and receiving in return such person's agreement to be bound by it:

- a. Counsel for the parties, including their associates, clerks, and secretarial and clerical personnel;
- b. Qualified persons taking testimony involving such information, and necessary stenographic, videotape and clerical personnel;
- c. Experts and their staff who are consulted by counsel for a party;
- d. Parties to the litigation, including their employees; and
- e. The Judge and his or her designated staff.

Such disclosures are authorized only to the extent necessary to prosecute or defend this litigation. Before disclosing CONFIDENTIAL INFORMATION to any authorized person who is a competitor (or an employee of a competitor) of the designating party, the party wishing to make such disclosure shall give at least fourteen (14) days' notice in writing to the designating party, stating the names and addresses of the person(s) to whom the disclosure will be made, and identifying with particularity the documents to be disclosed. If, within the 14-day period, a Motion is filed objecting to the proposed disclosure, disclosure is not authorized unless and until the Court orders otherwise.

3.2 Unauthorized Disclosures. If CONFIDENTIAL INFORMATION is disclosed to any person other than in the manner authorized by this Protective Order, the party or person responsible for the disclosure, and any other party or person who is subject to this Order and learns of such disclosure, shall immediately bring such disclosure to the attention of the designating party. Without prejudice to other rights and remedies of the designating party, the responsible party or person shall make every effort to obtain the return of the CONFIDENTIAL INFORMATION and to prevent further disclosure on its own part or on the part of the person who was the unauthorized recipient of such information.

3.3 Court Filings. In the event any CONFIDENTIAL INFORMATION must be filed with the Court prior to trial, it shall be filed in a sealed envelope at the expense of the filing party and marked on the outside with the title of this action, an identification of each document within and a statement substantially in the following form:

SUBJECT TO PROTECTIVE ORDER – This envelope containing the above identified material filed by [name of party] is not to be opened nor the contents thereof be displayed or revealed except as provided for in the Protective Order or by Court Order, or by agreement of the parties.

This provision is applicable to briefs, memoranda, and other filings that quote, summarize or describe CONFIDENTIAL INFORMATION. This provision is not applicable to Pleadings as defined in Missouri Supreme Court Rule 55.01.

4. Handling During Trial. CONFIDENTIAL INFORMATION that is subject to this Order may be marked and used as trial exhibits by either party, subject to terms and conditions as imposed by the Trial Court upon application by the designating party. The status of Confidential Material to be used at trial may be contested by any party, and taken up for hearing with the Court.

5. Handling After Trial. Within ninety (90) days of the conclusion of the above-captioned litigation, all Confidential Material, and copies of the same, obtained during this litigation and that are in the possession of the Parties, counsel for plaintiff, defendants, third-party plaintiff, and third-party defendants, or any non-party shall be returned to the producing party or shall be certified in writing to the produced party as having been destroyed.

6. No Implied Waivers. The entry of this Order shall not be interpreted as a waiver of the right to object, pursuant to the Missouri Rules of Civil Procedure, to the furnishing of information in response to discovery requests or to object to a requested inspection of documents for facilities. Neither the agreement to, or the taking of any action in accordance with the provisions of this Protective Order, nor the failure to object thereto, shall be interpreted as a waiver of any claim or position or defense in this action, or any other actions.

SO ORDERED, this ____ day of _____, 2021.

Judge

John P. Rahoy #41896
Edward W. Zeidler II #56638
BROWN & JAMES, P.C.
Attorney for Defendant Wal-Mart Stores East, LP
800 Market Street, Suite 1100

St. Louis, Missouri 63101
(314) 421-3400
(314) 421-3128 (Fax)
jrahoy@bjpc.com
ezeidler@bjpc.com

The undersigned hereby certifies that the above and foregoing pleading was filed electronically with the above-captioned Court, with notice of case activity to be generated and sent electronically by the Clerk of said Court to: mylegalworld@sbcglobal.net, Robert H. Pedroli, Jr. Eric Ruttencutter, Pedroli & Gauthier, LLC, Attorneys for Plaintiff, 130 S. Bemiston, Suite 300, Clayton, MO 63105-1911, this _____ day of _____ 20_____. Pursuant to Rule 55.03(a), the undersigned further certifies that he signed an original of this pleading and that an original of this pleading shall be maintained for a period not less than the maximum allowable time to complete the appellate process.

IN THE CIRCUIT COURT OF ST LOUIS COUNTY
STATE OF MISSOURI

ANNA WILLIAMS,)
)
 Plaintiff,) Cause No: 20SL-CC06023
)
 vs.) Division No: 18
)
 WAL-MART STORES EAST, L.P.) Defendant Demands Trial By Jury
)
 Defendant.)

CERTIFICATE OF MAILING

The undersigned hereby certifies that Defendant Wal-Mart Stores East, LP's Answers to Plaintiff's First Interrogatories were sent via email only to: mylegalworld@sbcglobal.net, Robert H. Pedroli, Jr. Eric Ruttencutter, Pedroli & Gauthier, LLC, Attorneys for Plaintiff, 130 S. Bemiston, Suite 300, Clayton, MO 63105-1911, this 31st day of March, 2021.

/s/ Edward W. Zeidler II

John P. Rahoy #41896
Edward W. Zeidler II #56638
BROWN & JAMES, P.C.
Attorney for Defendant Wal-Mart Stores East, LP
800 Market Street, Suite 1100
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/s/ Edward W. Zeidler II

IN THE CIRCUIT COURT OF ST LOUIS COUNTY
STATE OF MISSOURI

ANNA WILLIAMS,)
)
 Plaintiff,) Cause No: 20SL-CC06023
)
 vs.) Division No: 18
)
 WAL-MART STORES EAST, L.P.) Defendant Demands Trial By Jury
)
 Defendant.)

MEMORANDUM TO COURT

Defendant Wal-Mart Stores East, L.P. ("Defendant") filed a Motion for Entry of Protective Order on March 31, 2021. Since that time, counsel for Defendant has conferred with counsel for Plaintiff, and counsel for Plaintiff has indicated that he has no objection to entry of the Protective Order attached to Defendant's Motion for Entry of Protective Order. Therefore, by and with Plaintiff's consent, Defendant requests this Court to enter the Protective Order that was attached to Defendant's March 31, 2021 Motion for Entry of Protective Order. For the Court's convenience, Defendant has attached a copy of that Protective Order to this Memorandum.

/s/ Edward W. Zeidler II

John P. Rahoy #41896
Edward W. Zeidler II #56638
BROWN & JAMES, P.C.
Attorney for Defendant Wal-Mart Stores East, LP
800 Market Street, Suite 1100
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of May, 2021. Pursuant to Rule 55.03(a), the undersigned further certifies that he signed an original of this pleading and that an original of this pleading shall be maintained for a period not less than the maximum allowable time to complete the appellate process.

/s/ Edward W. Zeidler II

25973916.1/jbk
5/18/21

IN THE CIRCUIT COURT OF ST LOUIS COUNTY
STATE OF MISSOURI

ANNA WILLIAMS,)
)
 Plaintiff,) Cause No: 20SL-CC06023
)
 vs.) Division No: 18
)
 WAL-MART STORES EAST, L.P.) Defendant Demands Trial By Jury
)
 Defendant.)

NOTICE OF HEARING

PLEASE TAKE NOTICE that Defendant Wal-Mart Stores East, L.P. will call up for hearing via Webex its Motion for Entry of Protective on Thursday, June 24, 2021 at 1 p.m. or as soon thereafter as counsel may be heard. <https://mocourts.webex.com/meet/vcdiv18mtg> - Meeting Number: 146 118 7149.

/s/ Edward W. Zeidler II

John P. Rahoy #41896
Edward W. Zeidler II #56638
BROWN & JAMES, P.C.
Attorney for Defendant Wal-Mart Stores East, LP
800 Market Street, Suite 1100
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The undersigned hereby certifies that the above and foregoing pleading was filed electronically with the above-captioned Court, with notice of case activity to be generated and sent electronically by the Clerk of said Court to: mylegalworld@sbcglobal.net, Robert H. Pedroli, Jr. Eric Ruttencutter, Pedroli & Gauthier, LLC, Attorneys for Plaintiff, 130 S. Bemiston, Suite 300, Clayton, MO 63105-1911, this 18th day of May, 2021. Pursuant to Rule 55.03(a), the undersigned further certifies that he signed an original of this pleading and that an original of this pleading shall be maintained for a period not less than the maximum allowable time to complete the appellate process.

/s/ Edward W. Zeidler II

25973654.1/jbk
5/18/21

IN THE CIRCUIT COURT OF ST LOUIS COUNTY
STATE OF MISSOURI

ANNA WILLIAMS,)
Plaintiff,)
vs.) Cause No: 20SL-CC06023
WAL-MART STORES EAST, L.P.) Division No: 18
Defendant.) **Defendant Demands Trial By Jury**

NOTICE

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

TO: Mr. Lamont A. Williams
3740 Pyrenees
Florissant, MO 63033

Dear Mr. Williams:

Your spouse, Anna Williams, has filed the above-captioned cause of action alleging injuries as the result of an alleged injury that occurred on March 14, 2018 at a Wal-Mart store located in Fenton, Missouri.

You are hereby notified that, under Rule 66.01 of the Missouri Rules of Civil Procedure, you must assert any claim for loss of consortium or services, or either, arising out of such alleged injuries by joining as a plaintiff in the above-captioned action. If you fail to join as a plaintiff in such action to assert such claim within 30 days of receipt of this notice, your claim, if any, will be forever barred.

/s/ Edward W. Zeidler II

John P. Rahoy #41896
Edward W. Zeidler II #56638
BROWN & JAMES, P.C.
Attorney for Defendant Wal-Mart Stores East, LP
800 Market Street, Suite 1100
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ezeidler@bjpc.com

The undersigned hereby certifies that the above and foregoing pleading was filed electronically with the above-captioned Court, with notice of case activity to be generated and sent electronically by the Clerk of said Court to: mylegalworld@sbcglobal.net, Robert H. Pedroli, Jr. Eric Ruttencutter, Pedroli & Gauthier, LLC, Attorneys for Plaintiff, 130 S. Bemiston, Suite 300, Clayton, MO 63105-1911, this 7th day of June, 2021. Pursuant to Rule 55.03(a), the undersigned further certifies that he signed an original of this pleading and that an original of this pleading shall be maintained for a period not less than the maximum allowable time to complete the appellate process.

/s/ Edward W. Zeidler II

26056894.1/jbk
6/7/2021